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*Proposed Co-Lead Counsel for Movant Arman Anvari and the Class*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

GGCC, LLC, an Illinois Limited Liability  
Company, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a  
Delaware corporation, TEZOS STIFTUNG, a  
Swiss Foundation, KATHLEEN BREITMAN,  
an Individual, ARTHUR BREITMAN, an

Case No. 3:17-cv-06779-RS

Related case: 3:17-cv-07095-RS

**DECLARATION OF ARMAN ANVARI IN  
SUPPORT OF HIS MOTION FOR  
APPOINTMENT AS LEAD PLAINTIFF  
AND APPROVAL OF COUNSEL**

**CLASS ACTION**

1 Individual,

2 Defendants.

Judge: Hon. Richard Seeborg  
Courtroom: 3, 17<sup>TH</sup> Floor

3  
4 ANDREW OKUSKO, individually and on  
behalf of all others similarly situated,

5 Plaintiff,

6 v.

7 DYNAMIC LEDGER SOLUTIONS, INC.,  
8 THE TEZOS FOUNDATION, KATHLEEN  
BREITMAN, ARTHUR BREITMAN, and  
TIMOTHY DRAPER,

9 Defendants.

Case No: 3:17-cv-06829-RS

10 ANDREW BAKER, individually and on behalf  
11 of all others similarly situated,

12 Plaintiff,

13 v.

14 DYNAMIC LEDGER SOLUTIONS, INC., a  
Delaware Corporation, TEZOS STIFTUNG, a  
15 Swiss Foundation, KATHLEEN BREITMAN,  
an individual, ARTHUR BREITMAN, an  
individual, JOHANN GEVERS, an individual,  
16 STRANGE BREW STRATEGIES, LLC, a  
California limited liability company, and DOES  
17 1 through 100 inclusive,

18 Defendant.

Case No. 3:17-cv-06850-RS

19 BRUCE MACDONALD, Individually and on  
20 Behalf of All Others Similarly Situated,

21 Plaintiff,

22 v.

23 DYNAMIC LEDGER SOLUTIONS, INC., a  
Delaware corporation, TEZOS STIFTUNG, a  
Swiss Foundation, KATHLEEN BREITMAN,  
24 an Individual, ARTHUR BREITMAN, an  
Individual, TIMOTHY COOK DRAPER, an  
Individual, DRAPER ASSOCIATES, JOHANN  
25 GEVERS, DIEGO PONZ, GUIDO SCHMITZ-  
KRUMMACHER, BITCOIN SUISSE AG,  
26 NIKLAS NIKOLAJSSEN, and DOES 1-100,  
INCLUSIVE,

27 Defendants.

Case No. 3:17-cv-07095-RS

1 I, Arman Anvari, declare under penalty of perjury as follows:

2 1. I graduated cum laude from the University of Michigan Law School with a Juris  
3 Doctor in 2010, where I was an associate editor on the Michigan Law Review.

4 2. I am an attorney admitted to practice in Texas and Illinois.

5 3. Over the past seven and half years, I have practiced corporate law continuously, first  
6 with Latham & Watkins LLP in Houston, Texas between 2010 and 2016, and then with Baker &  
7 McKenzie LLP in Chicago, Illinois between 2016 and 2017.

8 4. I was briefly employed with Perkins Coie LLP in late 2017. I understand certain  
9 movants in this action have suggested that I was employed at Perkins Coie LLP for longer than that  
10 timeframe on the basis of my LinkedIn profile. However, that profile, when viewed by the movants,  
11 had not been updated to reflect my departure from Perkins Coie LLP in January 2018.

12 5. While at Perkins Coie LLP, I advised exclusively on private equity mergers and  
13 acquisition transactions. I did not advise on any cryptocurrency projects. Perkins Coie LLP did not  
14 represent Tezos or any of the Defendants in the above-captioned actions, and I have never worked on  
15 any matter related to Tezos or cryptocurrencies as an attorney.

16 6. My legal practice at Latham & Watkins LLP principally focused on debt and equity  
17 capital markets and general corporate governance, as well as mergers and acquisitions. While at  
18 Baker & McKenzie LLP and Perkins Coie LLP, I focused on mergers and acquisitions.

19 7. I have been actively monitoring the cryptocurrency industry since the middle of 2016  
20 and have been investing in cryptocurrencies since late 2016. As a result of my intensive study of the  
21 industry, I am well-versed in the dynamics of the cryptocurrency industry and am fully up to date on  
22 the latest developments with the Tezos project.

23 8. The cryptocurrency space is new and has developed very quickly. The ICO market  
24 itself has gone through several significant changes in the past year alone, and both the industry and  
25 what is considered standard market practice in the marketing of cryptocurrencies are constantly  
26 evolving. Complicated, industry-specific issues will be presented before the Court, whose decisions  
27 in this matter may have far-reaching ramifications not only for Tezos, but for the industry as a whole.  
28

1 As such, my expertise in and understanding of the cryptocurrency industry will be of value in guiding  
2 this litigation. Further, as an attorney myself, I believe I am well-placed to supervise counsel in the  
3 litigation of this matter.

4 9. I understand that certain other movants in this action have argued that I did not  
5 “personally sign” the Certification I submitted with my initial motion for appointment as lead plaintiff  
6 on January 25, 2018. On the evening of January 25, 2018, I flew from Chicago to San Francisco, a  
7 five-hour flight that took off from Chicago at approximately 7PM Central Time and landed in San  
8 Francisco at approximately midnight Central Time. While I provided my financial interest in the  
9 Tezos litigation earlier in the day and personally signed the Schedule A to my Certification setting  
10 forth my investments in the Tezos ICO, I was on my way to the airport and did not have access to a  
11 scanner when the final draft of my Certification was sent to me for review. I therefore authorized my  
12 attorneys to sign on my behalf after I reviewed and approved the final draft.

13 I declare under penalty of perjury that the foregoing is true and correct, this 15th day of  
14 February, 2018.



Arman Anvari